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Via email

Laurel Prevetti
Interim Director of the Planning Commission
The City of San Jose
cc: Rebecca Bustos, project planner; Kansen Chu, District 4 city councilmember

RE: Classification of buildings proposed in project application PD13-039

Dear Ms. Prevetti:

The permit for project application PD13-039 should be denied because it creates unnecessary negative impacts, which have not been studied in an EIR, to the neighboring school, park, and homes while providing little benefit towards the city's goals.

The Envision San Jose 2040 plan calls for 25,520 to 36,600 new jobs in Alviso. Achieving this goal would require land in Alviso to be dedicated to high job density uses. Freight and warehousing facilities have low job density. Trends in warehouse automation will reduce jobs at warehouses to near zero in the foreseeable years. The PD13-039 project's plan to build a hi-tech warehouse in Alviso would little serve the interests of the City, and therefore should not be permitted. The November 1, 2013 plan set for this project proposes two warehouses, which are misleadingly labeled HI-TECH MANUFACTURING buildings.

The Guide to Classifying Industrial Property, by James R. Lisle, Director of the Runstad Center for Real Estate Studies at the University of Washington, Seattle defines the following primary categories:

- Warehouse distribution
- Manufacturing
- Flex
- Multi-Tenant
- Freight
- Telecommunications

These categories are found similarly used in various literatures on the subject.

The principal exterior features that distinguish different types of industrial buildings are:

- building size
- site coverage

- loading capability
- car and trailer parking

and the main interior features are:

- ceiling heights
- space build-out
- power
- floor load and levelness.

The buildings are heavy distribution warehouses

Lisle writes on page 4, “The presence of docks along at least two walls is a core differentiating characteristic of both Truck Terminals and Heavy Distribution buildings.”

Warehouse Distribution buildings have exterior walls that allow efficient warehousing and distribution by one single tenant. That is the case in the plan set. Warehouse ceiling heights range from 16 to 80 feet to accommodate rack storage. The plan set shows approximately 30 feet. Warehouse square footage per loading dock is in the range of 3,000 to 15,000. The plan set is about 5,000.

Lisle further describes a Bulk Warehouse as one that exceeds 100,000 square feet. The plan set buildings are 253,000 and 368,000 square feet. Lisle writes, “Bulk Warehouses generally are not suited for manufacturing because of their insufficient power, high ceilings and high number of docks.”

“The majority of loading and unloading is performed utilizing docks and, to a lesser extent, drive-in doors. Ceiling heights in Bulk Warehouses generally exceed 20 feet, with slightly lower ceilings present in some older buildings. In newer buildings, advances in technologies are pushing ceiling heights above 30 feet.” The plan set has mostly docks with a lesser number of drive-in doors and ceiling height of approximately 30 feet.

Bulk warehouses require deep truck courts, which the plan set shows, and land site coverage up to 50%. I approximate, from the plan set, about 50% coverage.

“Ninety percent of Bulk Warehouse space is allocated to the storage of large quantities of goods. Office build-out is minimal and occupies a small percentage of the building’s overall size, typically below 10 percent of total space and in very large buildings closer to five percent.”

To accommodate rack systems and their weight, often as high as 4000 psi, bulk warehouses require level floors at least six inches thick. The plan set has level floors. Though the plan set does not specify the floor thickness, it appears to be at least 6 inches in the drawings.

In contrast to a bulk warehouse, a heavy distribution warehouse has a square foot to loading dock ratio of below 5,000. Building #1 in the plan set has a ratio of 4,689. Heavy distribution warehouses have loading docks on two sides, as is the case in the plan set. A truck terminal, by contrast, necessarily has

loading docks on two parallel sides, as is the case in the plan set. Due to ceiling height, heavy distribution warehousing can accommodate two-story office build-out as shown in the plan set.

The buildings are not manufacturing

Manufacturing buildings have a high ratio of car parking per square foot and therefore buildings have average site coverage of 40 percent or less. Building 1 has a ratio of approximately 600 sq ft per parking space and site coverage of approximately 50 percent.

Average light manufacturing buildings have ceiling heights of 16 to 24 feet. The plan set buildings have approximately 30 foot ceilings.

Average manufacturing buildings have a square foot to dock ratio of 10,000 to 15,000. The plan set buildings are approximately 5,000.

Heavy manufacturing varies from light manufacturing and warehousing in that it generally requires cranes within the buildings. The plan set shows buildings with a grid of pillars that would preclude the use of cranes.

The buildings of the plan set do not fall into the Flex classification, which comprises office build-out in 25 to 80 percent of the space; the multi-tenant classification, which is characterized by a maximum size of 120,000 square feet, configured in an L or U shape; or the telecommunications classification. Though the buildings have cross-docking like a truck terminal, they also does not fall into that classification, which requires about 60 feet total width and a square foot to dock ratio of 500 to 1000.

Conclusion

The November 1, 2013 plan set for project PD13-039 proposes two buildings that can only be classified as heavy distribution warehouses, and are misleadingly labelled with the term manufacturing. They would likely be used for trucking purposes that would create a nuisance on the side of the property closest to the school, park, and homes, which would explicitly violate the Alviso Master Plan. The buildings would likely be used for automated rack storage that would require few employees and take up land area that could otherwise be used in ways that would better advance the aggressive Envision San Jose 2040 goal of creating more than 25,000 jobs in Alviso. Only smaller buildings with lower ceilings, fewer docks, more office build-out, and more parking would serve the purpose of manufacturing. Common sense dictates that in order for the city to guarantee that it gets manufacturing jobs, you must not approve a building that is designed for heavy distribution warehousing.

Please deny a permit to the project as it is currently proposed.

Regards,

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